

FILED

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U.S. DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) No. 4:14CR00275 HEA/TCM
JAROD PARKER,)
Defendant.)

INDICTMENT

COUNT 1

(Mail Fraud)

The Grand Jury charges:

A. **The Scheme to Defraud**

1. Beginning on or about July 1, 2014, and continuing through on or about September 1, 2014, in the Eastern District of Missouri,

JAROD PARKER,

hereinafter referred to as defendant, and others known and unknown to the Grand Jury, devised, and intended to devise, a scheme and artifice to defraud a federally insured financial credit union and an automobile dealership, by means of materially false and fraudulent pretenses, representations and promises that, his credit was better than it actually was and that he had been gainfully employed as a registered nurse in order to obtain a motor vehicle loan, well knowing that such pretenses, representations and promises would be and were false and fraudulent when made.

2. It was part of the scheme and artifice to defraud that:
 - a. Defendant applied for a motor vehicle loan during the time that he was completing a term of incarceration through the Federal Bureau of Prisons through a program in which he resided with a relative in St. Charles, Missouri.
 - b. Defendant used the social security number of his minor child while applying for a loan from a federally insured financial institution for the purchase of a 2014 Chevrolet Camaro valued in excess of \$30,000.00.
 - c. In completing the application, defendant claimed that he had been residing at 6006 Boulder Creek Drive, Hazelwood, Missouri for seven years, and had been a registered nurse earning \$3,500.00 per month for six years.
 - d. Based upon the claims, Scott Credit Union of Sacramento, California approved financing of the vehicle which was being sold by a local motor vehicle dealership.
 - e. Defendant took possession of the vehicle.

B. **The Mailing**

3. On or about July 16, 2014, in the Eastern District of Missouri,

JAROD PARKER,

the Defendant, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be deposited a letter containing a fraudulently obtained motor vehicle title for a 2014 Chevrolet Camaro which was sent and delivered by the United States Postal Service and a private and commercial interstate carrier from 2244 South Kingshighway, St. Louis, Missouri, to Jarod Parker at 6006 Boulder Creek Drive Unit 1806, Hazelwood, Missouri.

In violation of Title 18, United States Code, Section 1341.

COUNT 2

(Bank Fraud)

The Grand Jury further charges:

1. At all times relevant to the indictment, Scott Credit Union had assets insured by the National Credit Union Association.
2. Between on or about July 1, 2014 and continuing to on or about September 1, 2014, within the Eastern District of Missouri and elsewhere,

JAROD PARKER,

the Defendant herein, devised a scheme and artifice to obtain moneys, funds, and assets owned by and under the custody and control of the federally insured financial institution by means of false and fraudulent pretenses and representations.

3. The scheme and artifice to defraud was in substance as follows:
 - a. It was part of the scheme and artifice to defraud that defendant utilized the social security number of his minor child in applying for a motor vehicle loan.
 - b. It was further part of the scheme and artifice to defraud that defendant provided false information in the application for the motor vehicle loan by misrepresenting his residence, employment, and income.
 - c. It was further part of the scheme and artifice to defraud that, when the motor vehicle loan was approved, defendant took possession of the 2014 Chevrolet Camaro.

4. On or about July 4, 2014, in the Eastern District of Missouri,

JAROD PARKER,

the defendant herein, executed and attempted to execute the scheme and artifice as set forth above, in that he signed a security agreement with Scott Credit Union in conjunction with a motor vehicle loan for the purchase of a 2014 Chevrolet Camaro valued in excess of \$30,000.00.

In violation of Title 18, United States Code, Section 1344.

COUNT 3

(Aggravated Identity Theft)

The Grand Jury further charges:

On or about July 1, 2014, within the Eastern District of Missouri,

JAROD PARKER,

the Defendant herein, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit, the social security number of his minor child, during and in relation to the commission of the felony offenses of: mail fraud, Title 18, United States Code, Section 1341, bank fraud, Title 18, United States Code, Section 1344, and social security fraud, Title 42, United States Code, Section 408(a)(7)(B).

In violation of Title 18, United States Code, Section 1028A

A TRUE BILL.

FOREPERSON

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